

December 13, 2013

Mr. Charles David Abshire (6SF-AP)
Remedial Project Manager
U.S. Environmental Protection Agency
Region 6
1445 Ross Avenue
Dallas, TX 75202-2773

RE: November 2013 Monthly Report
United States of America and State of Texas v. Alcoa, Inc., et al.; CA No. 3:12-cv-00210
Malone Service Company Superfund Site - Texas City, TX

Dear Mr. Abshire:

On behalf of the Malone Cooperating Parties (MCP), in compliance with and pursuant to the Consent Decree (CD) and Statement of Work (SOW) for Remedial Design/Remedial Action (RD/RA) at the Malone Service Company Superfund Site in Texas City, TX, attached please find the Monthly Report for November 2013.

Should you have any questions, please contact me at 919-539-1928 or [bobjp@projectnavigator.com](mailto:bobp@projectnavigator.com).

Sincerely,

R Piniewski

Robert Piniewski
Project Coordinator

cc: Marilyn Long - TCEQ
Malone Cooperating Parties

**MALONE SERVICE COMPANY SUPERFUND SITE
MONTHLY PROGRESS REPORT FOR NOVEMBER 2013
SUBMITTED DECEMBER 13, 2013**

1) SUMMARY OF WORK PERFORMED IN NOVEMBER 2013

- a) PNL, ENTACT and MCP representatives continued evaluation of information collected during the Phase One RD work.
- b) ENTACT continued work on the draft Phase One RA Work Plan and data report.
- c) MCP representatives continued efforts on the Cemetery Relocation.
- d) MCP representatives continued stormwater management activities at the Site.
- e) PNL, ENTACT and MCP representatives met with representatives from EPA and TCEQ via conference call on November 8, 2013 to discuss the Site. Key items of discussion and agreement included:
 - i) EPA approved the use of the Site's Stormwater Management Plan's discharge criteria for treatment and discharge of groundwater or water from excavation pits.
 - ii) EPA approved the use of in-situ auguring for material solidification.
 - iii) EPA noted that the SW 1315 Mass Transfer Analysis, which could potentially be substituted for SPLP analysis of solidified material, is approved for only metals and PAHs and not yet approved for VOCs. EPA indicated if solidified material met TX Class 3 Groundwater Standards it would consider allowing material to be left in place.
 - iv) EPA granted a 45 day extension for submittal of the Phase One RA Work Plan.
- f) PNL, ENTACT and MCP representatives met with representatives from EPA and the Underground Injection Control (UIC) program via conference call on November 13, 2013 to discuss the injection wells at the Site.

2) SUMMARY OF SAMPLING/TESTING RESULTS

- a) None.

3) DELIVERABLE STATUS & MODIFICATIONS TO PLANS

- a) A summary of the most recent Agency Communication is shown in Table One.

4) POTENTIAL PROBLEM AREAS and ACTIONS TO BE TAKEN

- a) None.

5) COMMUNITY RELATIONS ACTIVITIES

- a) MCP representatives will support EPA's community relations efforts as requested by EPA.

6) CHANGE IN PERSONNEL OR OPERATIONS

- a) None.

7) SCHEDULE

- a) The Phase One RD Work Plan contains the project schedule.

8) PROJECTED WORK FOR NEXT TWO REPORTING PERIODS (DECEMBER 2013 AND JANUARY 2014)

- a) Finalize off-site, Phase One RD work (e.g., data analysis, treatability study).
- b) Continue efforts on the Cemetery Relocation.
- c) Continue stormwater management activities at the Site.
- d) Submit draft Phase One RA Work Plan.

Table 1
Recent Agency Communication Summary
Malone Service Company Superfund Site – Texas City, TX

| Date | MCP Communication Summary | Response From EPA Date | EPA Communication Summary | Notes |
|-------------|--|---------------------------------------|--|--------------|
| 5/28/13 | Submitted the Final Phase One RD Work Plan | 5/28/13 | EPA provided written approval of the Phase One RD Work Plan. | |
| 8/20/13 | Submitted the Final Assessment of Potential Impact of Remediation of Malone Service Company Superfund Site on Historic Properties, Galveston County, Texas. | 8/21/13 | EPA acknowledged receipt of the plan. | |
| 10/16/13 | Via email the MCP, under Section XIX (Force Majeure) of the governing Consent Decree, notified EPA that due to the government shutdown and other circumstances there would be a delay in the submission of the Phase One RA Work Plan. The MCP will provide the information prescribed by Paragraph 74 of the Consent Decree once the government shutdown has ended and the MCP has been able to consult with EPA regarding various technical issues and the schedule going forward. | pending | | |

Table 1
Recent Agency Communication Summary
Malone Service Company Superfund Site – Texas City, TX

| Date | MCP Communication Summary | Response From EPA Date | EPA Communication Summary | Notes |
|-------------|---|---------------------------------------|--------------------------------------|--------------|
| 11/8/13 | <p>EPA, TCEQ and MCP representatives participated in a conference call. During the call:</p> <ul style="list-style-type: none"> • EPA approved the use of the Site's Stormwater Management Plan's discharge criteria for treatment and discharge of groundwater or water from excavation pits. • EPA approved the use of in-situ auguring for material solidification. • EPA noted that the SW 1315 Mass Transfer Analysis, which could potentially be substituted for SPLP analysis of solidified material, is approved for only metals and PAHs and not yet approved for VOCs. EPA indicated if solidified material met TX Class 3 Groundwater Standards it would consider allowing material to be left in place. • EPA granted a 45 day extension for submittal of the Phase One RA Work Plan. | n.a. | | |